

EXHIBIT A

Will Routt

From: Will Routt
Sent: Saturday, December 29, 2018 1:50 PM
To: Frank Watson; Horton, Odell
Cc: Craddock, Bob; Trammell, Brad; McLaren@blackmclaw.com; Petronio, Beth W.; Whitwell, Lee; btimmons@blackmclaw.com; wcochran@blackmclaw.com; Bill Burns; Floyd, Amber; Brown, Byron; Cox, Meghan
Subject: RE: Draft PARTIES' JOINT MOTION AND MEMORANDUM REQUESTING APPROVAL OF THE PROPOSED PROTECTIVE ORDER
Attachments: Proposed ESI Protocol Search Terms.pdf; DISCO_incomingProductionStandardFormats.pdf

Odell-

Plaintiffs' proposed ESI protocol is as follows. As discussed, the County has agreed, based on the court's anticipated ruling, to run search terms across the electronic documents of certain custodians during a limited time frame – we propose October 1, 2016 to June 30, 2017 – and to produce all of the results (excluding privileged items, if any). To that end, we've attached a list of proposed search terms and included a proposed custodian list below. The custodian list is made up of individuals who are parties to the lawsuit, were identified in the parties' written discovery, or who appear to have been involved in the Odyssey implementation based on Tyler's email production. I've also attached the technical specs that we need the County to follow for our ESI vendor to properly process the production.

We are happy to discuss on Monday.

Will

Custodian List:

Bill Anderson
Sharon Baker
Gortria Banks
Undrea Banks
Rheunte Benson
Kenneth Cole
Brian Conner
Sceva Cummings
Richard DeSaussure
Wink Downen
Adrienne Evans
Earle Farrell
Donna Farris
Debra Fessenden
Chris Floyd
Barry Ford
Christopher Ford
Casey Freeman
Colleen Funk
Robert Gibson
Jack Green
Travis Green

Liana Greer
John Halbert
James Hamm
Debra Hammons
Lorean Hearns
Randy Hendon
Terry Holland
Leonard Hopkins
Pamela Hymon
Katina Issac
James Johnson
Jennifer Johnson
Audrey Joy
Danny Kail
Srividya Kalidindi
Camille LeDoux
Steve Leech
Mildred McCallister
Norma McCracken
Charlene McGhee
Robert Moore
Terry Moten
Anu Naidu
Praneeth Nangunoori
John Niven
Michael O'Donnell
Bill Oldham
Anthony Parker
Carman Quatrone
Ed Raper
Mary Ross
Lalitha Sankaran
Phyllis Sheppard
Steve Solass
Edward Stanton, Jr.
Terri Stanton
Linda Stinson
Raymond Tant
Kelly Tulley
Shawna Vanhooks
Vamsi Vejeria
Keva Walton
Shawna Webb
Helen Wren
gsit@shelbycountyn.gov (general sessions IT email address),
service.desk@shelbycounty.gov

From: Frank Watson
Sent: Friday, December 28, 2018 8:18 PM
To: Horton, Odell
Cc: Craddock, Bob; Trammell, Brad; Will Routt; MMcLaren@blackmclaw.com; Petronio, Beth W.; Whitwell, Lee; btimmons@blackmclaw.com; wcochran@blackmclaw.com; Bill Burns; Floyd, Amber; Brown, Byron; Cox, Meghan
Subject: Re: Draft PARTIES' JOINT MOTION AND MEMORANDUM REQUESTING APPROVAL OF THE PROPOSED PROTECTIVE ORDER

Dear Odell:

It doesn't look like you read the decision I sent you last week of Howard et al v. Wilkes & McHugh PA et al authored by Magistrate Pham. Had you done so, we could have avoided a skirmish as to a protective order that we otherwise agreed to weeks ago. The Defendants' evolving edits to this, as well as their continual refusal to provide the relevant documents, warrants fees under Rule 37, which we will request at our next hearing on 1/17. Play time is over.

Frank L. Watson, III
Watson Burns, PLLC
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Memphis, Tennessee 38104
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www.watsonburns.com

On Dec 28, 2018, at 2:33 PM, Horton, Odell <ohorton@wyattfirm.com> wrote:

All:

Attached is the draft Joint Motion. Just a little wishful thinking.

Odell Horton Jr.

Wyatt, Tarrant & Combs, LLP
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<image001.jpg>

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<61799613-v1-Parties Joint Motion and Memorandum for Protective Order.docx>

- 1983
- Action
- Admin*
- Adopt
- Alameda
- Amend*
- Apology
- Appearance
- Approve
- Arraign
- *Arrest*
- Attorney
- Authorize*
- Aware
- Back-up
- Bartel
- Bed
- Bond
- Booking
- Breach
- Break
- broken
- Brophy
- Budget
- Bug
- Bump*
- Butler
- Cameron
- “case management”
- Cause
- Cell
- Chair
- charge
- Class
- Comfort
- Common
- Compatible
- Compensat*

- Complain*
- *complet*
- Complicat*
- Computer
- Concerns
- Condition
- Constitution
- Convict*
- Cooper
- Correct
- “court management”
- Critical
- Crowd
- Crucial
- Cullison
- Custody
- Custom
- Cycle
- Damn
- Data
- Days
- Debacle
- Defect*
- Delay
- Demo*
- Depart
- Depriv*
- Detain*
- Detention
- Determin*
- Dim
- Disaster
- Dismiss
- dispose
- Docket
- Dormitory
- Down
- Duplicate

- Ector
- Error
- Essential
- Example
- Fail*
- Fault
- Fiasco
- Fix
- Flaw
- Floor
- Flow
- Food
- Format
- Frequent*
- Fuck
- Function
- Funny
- Future
- Global Tel*Link
- Golive
- Gross
- *@gtl.net
- Guard
- Hand
- Harass
- Hell
- Help
- Holding
- Hours
- iCJIS
- Implement*
- Imprison
- IMS
- Incarcerat*
- Identical
- Imperative
- Impossible
- Inactive

- Indifference
- Information-technolog*
- Inhumane
- Inmate
- Intake
- Integrat*
- Interface
- Investigate
- Issue
- IT
- “jail support specialist”
- “jail population management”
- Jail*
- Jefferson
- JMS
- Job
- Johnsey
- Joke
- JSS
- JSSI
- Judge
- Jury
- Justif*
- Kiosk
- Languish
- Lawsuit
- Lawyer
- Legacy
- Liberty
- Lights
- Linger
- Litigation
- Live
- Locat*
- Long
- Lose
- Lost
- Magnitude

- Major
- Management
- Manual*
- Merced
- Mess
- Miserable
- Mock
- Money
- Negligen*
- News
- Notice
- Nugent
- Odessa
- Odyssey
- OMS
- Operat*
- Organiz*
- Overcrowd
- Over-detain
- Over-populat*
- Paramount
- Patch
- Phase
- Policy
- Population
- Post
- Pre-set
- Press
- Prevent
- Price
- Prisoner
- Priority
- Probable
- Problem
- Process
- Program
- *proper*
- Protect

- Provider
- Puckett
- rage
- Re-arrest
- Ready
- Release
- Replac*
- Report*
- Resolve
- Responsible
- Restore
- Require
- Rights
- “roll out”
- Schedule
- Seizure
- Serious
- Set
- Shit
- Short-sight
- Sierra-cedar
- *@sierrasystems.com
- Significant
- simlulat*
- sit*
- Skahan
- sleep*
- slip
- smooth
- software
- software-AG
- Spence
- Statement-of-work
- Status
- steering-committee
- storm
- stuck
- surprise

- system*
- terminate
- terrible
- test
- Thompson
- track*
- train*
- trouble
- Tyler
- *@tylertech.com
- Unable
- Unacceptable
- Unbelievable
- Unlawful
- Urgent
- Vendor
- violation
- vital
- wall
- warning
- warrant
- water
- week
- wors*
- wrong
- Zigler